

**American Red Cross****Arcadia Chapter**

JUL - 6 2010

DOCKET FILE COPY ORIGINAL
FCC Mail Room

376 West Huntington Drive
 Arcadia, California 91007-3402
 (626) 447-2193
 (626) 445-4147 Fax
 www.arcadia-redcross.org

Federal Communications Commission

Comments on the docket pending on the review of part 95 personal radio service

The following are comments on the GMRS docket pending before the commission
 known as WT Docket No.10-119

I am writing these comments as the Volunteer Disaster Communications Chairman of the
 Arcadia Chapter of the American Red Cross. It should be understood that almost 100 %
 of the Red Cross disaster communication staff nationwide, at the local chapter level, are
 volunteers.

My name is Donald Barton Best and I am a 52 Year volunteer of the American Red Cross
 with over 47 years involvement in disaster relief and 12 years as a disaster relief
 communications manager in the Los Angeles County area.

Important Notice: The following comments and ideas are the opinions of Arcadia
 Chapter Red Cross disaster communications volunteers and in no way reflects
 the policies of the American Red Cross organization or any of its units nor does it
 reflect the ideas or policies of any Red Cross paid employee.

Statements on Red Cross and other volunteer use of GMRS repeated communications:

- First of all the majority of my communications team (20 active and 25 reserve members)
 at Arcadia Chapter ARC is completely against the changes purposed in this
 Rulemaking and have provided comments included in this reply
- Almost every chapter in the Los Angeles area used GMRS to some extent
- The Arcadia Chapter as an organization operates under FCC GMRS License KDA6329
- The American Red Cross receives mutual aid support from many organizations
 during disaster relief operations that use GMRS as their communications
 system, for example REACT International teams in the Los Angeles and
 Orange county areas
- The American Red Cross has used GMRS (and its previous name Class "A" C.B.) in
 EVERY major earthquake and wildland fire in Southern California since
 1970 including the;
 - 1970 wildland fires
 - 1971 San Fernando Earthquake
 - 1987 Whittier Earthquake
 - 1994 Northridge Earthquake
 - 2003 wildland fires

No. of Copies rec'd 0+4
 List ABCDE

- Using GMRS repeaters allow a quick placement of a critical repeater to fill a Communications gap without any more than a call to the volunteer GMRS repeater coordination groups
- In the Los Angeles area, the GMRS radio service has a working volunteer repeater coordination groups just like Amateur Radio Service which work through repeater owner cooperation to insure repeater separation and CTCSS tone assignments to prevent interference
- The American Red Cross has invested in commercial grade part 90/95 type certified GMRS repeaters nationwide which in total is a large investment and all of our Red Cross and volunteer owned equipment used on disaster relief operations and Training are part 95 AND 90 type certified by the FCC
- The Arcadia Chapter ARC owns and uses two GMRS repeaters for disaster relief operations; one ground level repeater located at the chapter for local relief operations and one high level repeater located on a tall building for mutual aid support of other local ARC chapters
- Use of GMRS is critical for some chapters because business bands (IB service) and public safety bands (PX service) supporting repeater operations are saturated especially in the Los Angeles/San Diego area
- The Arcadia Chapter ARC applied to the "PX" radio service frequency coordinator in the Los Angeles area (APCO, The Associated Public-safety Communications Officers Assn.) for a frequency coordination needed for a chapter repeater frequency for chapter disaster relief operations. We were informed there were no VHF High Band (151-160MHz) or UHF (450-460MHz) frequencies available we would have to buy a complete new system on another band-**not realistic**.
- Other than the Amateur Radio Service, GMRS is the only repeated radio service that Red Cross can call on to have VOLUNTEERS supply needed base, mobile, Portable **AND REPEATER EQUIPMENT** at no cost to the Red Cross in its disaster relief efforts
- The GMRS licensed volunteers fill in when Amateur Radio Service volunteers are not available due to lack of commitment or over commitment to multiple organizations that need amateur support for emergency operations
- During an active disaster operation, the Arcadia Red Cross Volunteer Communications Supervisor contacts his/her field communications coordinators on a GMRS interstitial low power frequency every hour to relay updated public relief operation status and information so they may inform any citizen who asks any Red Cross communicator for relief information status to get correct updated information. This also allows any member of the public with an FRS radio or a scanning receiver to monitor this transmission at will. These transmissions, although sent between licensed GMRS Red Cross volunteers in fact becomes a "disaster public information network"
- REACT the old citizens band c.h.-9 safety stand-by organization is still alive and well Nationwide and had a national mutual aid agreement with The American Red Cross to provide disaster relief communications to Red Cross Chapters. For some chapters, REACT is the only disaster relief communications capability the Red Cross Chapter has to run their relief operation.

A reminder, most small Red Cross chapters DO NOT spend scarce donated dollars on radio equipment. Without REACT, some chapters have nothing in the way of volunteer radio communications for use in their local disaster relief effort

- Our chapter has 20 first line communications volunteers to support small and moderate Disaster Relief operations. Of these 20 volunteers, 18 are dual licensed having Amateur radio and GMRS personal licenses and 2 have only GMRS licenses [My personal licenses are N6ALD (amateur) and WQHV441 (GMRS)]
- Some of Arcadia Chapter's 25 reserve communicators (who dedicate 8 to 60 volunteer hours per year to Red Cross Communications) do not have the technical capabilities to qualify for an amateur radio license due to developmental limitations but are perfectly capable and are qualified radio operators and GMRS is their ONLY route to getting a personal radio license. These operators have valid GMRS family licenses and in some cases own GMRS equipment and operate on GMRS daily talking to their own family members through a family owned repeater which is loaned to the Red Cross during disaster operations
- It is my opinion that lowering the status of GMRS to high powered FRS STATUS is a disservice and a violation of the Americans with disabilities Act which states whenever possible accommodations would be made to persons with disabilities and I think that GMRS is the exact route that the congress had in mind when ADA was put into law. GMRS is the answer to developmentally disabled persons who cannot qualify, due to limited learning or technical capabilities, for an Amateur Radio License. It provides simplex, repeated, low power and high power operation and the ability for an ADA QUALIFIED PERSON TO HAVE A NEAR AMATEUR RADIO EXPERIENCE and to improve their quality of life.

-As you can see there are many reasons to leave GMRS part 95 the way it is. If some parties believe a higher power FRS service is needed then raise the power on some FRS radio frequencies and leave GMRS as it is today. It is a very small service compared to the Amateur Radio Service and in some areas serves the same purpose when Amateur Radio Operators are not available. It would be a great disservice to the Red Cross organization its disaster relief effort capabilities and its volunteers who provide or depend on GMRS communications for their safety in the field or to provide needed logistics support for the disaster relief effort. Changing GMRS to a simplex high powered FRS service would also deny repeated communications service needed to do life saving too many other volunteer organizations that do not have the funds to pay for the frequency coordination, the radio equipment, the equipment upkeep nor the very high cost of commercial communications services which would have to replace GMRS. These ALL volunteer organizations whose members each possess an individual GMRS license include;

- mountain rescue
- explorer search and rescue
- volunteer fire departments
- sheriff search and rescue
- local fire safe councils

Community Emergency Response Teams (CERT)
 volunteer marine animal rescue teams
 volunteer S.P.C.A. urban animal rescue teams
 fire auxiliaries
 ski patrol teams
 neighborhood watch patrol teams
 police auxiliaries
 desert sundown citizen safety patrols
 sheriff auxiliaries
 highway and interstate blizzard safety patrols

This change in GMRS rules would destroy communications for hundreds of volunteer teams across the United States, some just formed under FEMA direction, **FOR NO VALUE EXCEPT TO FORCE THE PURCHASE OF THE NEW TYPE CERTIFIED EQUIPMENT AND/OR TO FORCE VOLUNTEER TEAMS INTO USING PAID COMMERCIAL SERVICE PROVIDERS (CELLULAR, NEXTEL ETC.) AND THE FUTURE TAKING OF THEIR GMRS FREQUENCIES FOR ANOTHER RADIO SERVICES BENEFIT.**

It seems to me and my team, is time to support the great volunteer efforts of the citizens of the united states who save local, county, parish and state government agencies millions of dollars per year and to stop doing everything for the cooperation at the cost of services to the citizens. I truly believe if GMRS was still loaded with corporate and business use as it was while class "A" C.B. this proposed rule making would have never been submitted for review.

Statements on the individual paragraphs of the proposed rulemaking

<u>Paragraph #</u>	<u>Comments</u>
3	Old rules are not bad rules just because of their age
4	The use today is wide area family communications for safety and family operations
7	The original purpose of Class A citizens band was NOT simplex communications, it was citizen and small business repeated wide area communications. Do not mix up GMRS with the newer low power FRS
8	There is no reason to eliminate GMRS just to make the rules simpler, these changes destroys a valuable radio service. If you want to make Part 95 into an all simplex service then move GMRS in its entirety as it is today to FCC part 27

- 12 This sounds like a spectrum grab at the expense of the
of the citizens of the United States and a new requirement
that all Part 95 users buy NEW radio equipment as a way
to increase equipment manufactures corporate profits
- 13 There is no problem phasing in new equipment
requirements as was done in Part 90 in the narrow
band upgrade over years as old equipment is retired
- 14 Do not allow equipment makers to do self certification,
This is just a route to loss of radio quality and rules
compliance
- 15 Like Part 90, the FCC can specify both equipment power
Out of the transmitter and effective radiated power out of
the antenna without any problem
- 18 Use the same equipment requirements and emission masks
as used in similar equipment in Part 90
- 19 allow digital emissions but use the same requirements as
exist in Part 97 that ensures digital emissions are NOT
encrypted transmissions. Any type of encryption prevents
FCC rules enforcement including non-business and FCC
call sign use
- 20 STOP WITH THE CHANGING OF EQUIPMENT
EQUIPMENT REQUIREMENTS AWAY FROM PART
90 RADIOS. Radios used in Part 90 are the highest quality
in the world keep GMRS using equipment dual type
certified for both Part 90 and Part 95 within the existing
Part 95 rules
- 23 Do not mix GMRS repeated service radio equipment with
the trash sold as FRS/GMRS compatible hand held radios
in "blister packs" at sporting goods stores. These
FRS/GMRS radios are just an END AROUND RUN of the
FCC rules to allow high power FRS equipment. The whole
idea of combined "licensed by rule" and "licensed by FCC
application" frequencies in the same radio on ANY service
should be abolished. Do not include FRS and marine radio
or FRS and amateur radio as a matter of fact do not allow
FRS radios to be included with any other service or the
second service will be destroyed

- 24 The GMRS repeaters used around the United States especially in the rural farm areas are used to support family operations over a wide area that cannot be covered by simplex operation at any power on UHF
- 25 The statement that only a small percentage of GMRS Repeater operations are FCC licensed is in error and a false statement used just to support this rule making. YES a majority of use on the GMRS ONLY channels by people using Blister pack FRS/GMRS hand held radios is unlicensed and illegal which is why FRS/GMRS combined hand held radios should be outlawed. FRS radios should have 14 low power channels only
- 26 Another mis-statement is that GMRS is like other Part 95 Services. GMRS repeated is nothing like other Part 95 Radio services and the only reason it is included in part 95 is because it is a CITIZENS service not a business service. This whole rule making about GMRS is a way to eliminate CITIZENS REPEATED SERVICE. Citizens who use GMRS do NOT want a simple simplex high power FRS Service to replace existing GMRS. IF the total investment in Part 90/95 type repeaters, mobiles, portable and base station equipment that would be made obsolete by this rule making, it is a staggering investment by the publics that would be lost. The public who uses GMRS would like additional rules similar to Part 97 rules to upgrade the quality of service to the public by GMRS. GMRS users do not want a "lighter burden" they want an improved GMRS service
- 27 This paragraph makes no sense in the real world, Licensing by rule is the same as completely unregulated runaway use of radio frequencies, look at Part 95 class "D" Citizens radio service. Unlimited use of high power R.F. amplifiers, no frequency coordination, unlimited cussing on the air, unlimited channel jamming to prevent certain channel use by citizens (channel use reservation by jamming) and rampant use by drug dealers for their lookouts to guard against police, also a problem with FRS
- 28 Extending the license term of GMRS authorizations to ten years is a good idea and provides good value for the cost

29 The reason GMRS has not dropped in to the chaos that Has destroyed the use of Class "D" citizens band for the average citizen and is the direction FRS is going with the illegal high power radios on all 14 channels and the illegal FRS repeaters is because GMRS is licensed by FCC individual authorization and it is supervised by responsible adults who have invested in type certified repeaters and commercial quality radio equipment

32 Again limiting GMRS portable equipment to 2 watts relegates GMRS to the high power status and completely destroys the value of GMRS to the average family who needs wide area coverage and *please do not tell me they can buy cell phones*

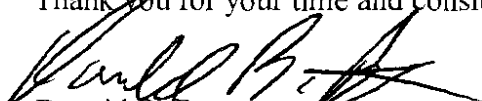
33 We believe no GMRS equipment should be used until it meets PART 90 type certification requirements within GMRS power limits this would insure quality equipment not trash overseas imports that are now showing up on the market with false FCC type certification on the radios.

The statement that COMMERCIAL COMMUNICATIONS PROVIDERS can provide the same service as GMRS is insane, this statement is made only to insure the enrichment of cellular, Nextell type and SMR type services at the cost of the small family who now only has to get a GMRS license and some communications equipment (repeater, mobiles/portables and a base station) NO MONTHLY CHARGE AND PER MINUTE CHARGE

36 There is no reason not to narrow band GMRS in the future using the same equipment phase out schedule used for Part 90 service radios. Starting today I believe 15 years should be about right. GMRS users are not second class citizens and deserve the same rights and follow the same rules for equipment upgrade as Part 90

37 Remember Part 95 Class "A" citizens band started as a 10 MHz wide repeated radio spectrum and has continued to loose spectrum over the years.

Thank you for your time and consideration of these comments;


Donald B. Best